Earth Systems
Environmental Engineering

March 15, 2022

Via Email/Sharefile

Mr. Sam Abdellatif
Land and Redevelopment Programs Branch
US Environmental Protection Agency Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Re: Response to CSM Comment Memo (10/13/2021) from Gina Ferreira
Hess Corporation Former Port Reading Complex (HC-PR)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483

Dear Mr. Abdellatif:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) regarding the October 13, 2021 Memorandum provided by the Environmental Protection Agency (EPA) relating to the Conceptual Site Model (CSM) submitted on March 29, 2021. As explained in the March 1, 2022 Response to Comments (RTC) addressing the New Jersey Department of Environmental Protection (NJDEP) comments; the following immediate revisions will be made to the CSM once the NJDEP RTC is approved:

- Figure or Figures depicting historic temporary well locations, temporary well observations, and applicable temporary well data will be included
- Boring logs utilized to prepare the cross-section figures will be included with the CSM and aquifer interval descriptions will be revised (if necessary) to make sure they are consistent in the text of the report and the included figures
- NJDEP/EPA Approved July 8, 2021 AOC group list and figures will be included with the CSM

- Groundwater contour maps for 2018 and 2020 and a USGS Topographic Map will be included
- Table E-1 will be revised to include the requested information

As explained above, these immediate changes will be made to the CSM and the CSM will be retitled as "Version 2" and will include the revision date. The CSM will continue to be updated as additional data is collected as part of the ongoing Remedial Investigation (RI) activities being conducted at the Site. At this time, we do not anticipate submitting a revised CSM (beyond Version 2) until the conclusion of all RI activities.

EPA Comments & Earth Systems/Hess Responses

EPA Comment 1: Page 38, Section 7 Anticipated Remedial Selection – It is premature to propose remedial actions for the site's contaminated soil and groundwater without having final human health and ecological risk assessments or an appropriate substitute (comparing site media concentrations to protective screening values) to determine if there are potential unacceptable risks. Potential remedial actions at the site may also include contaminated sediment which is left out of this section.

Earth Systems/Hess Response 1: Potential remedial options were included in the report to ensure that all parties were aware that the remedial strategy for the site will be a multi-pronged approach and likely include limited excavation, in situ remediation, as well as institutional and engineering controls. Once the Ecological Evaluation is complete at the Site, a determination will be made regarding remedial options to address impacted sediment, if necessary.

EPA Comment 2: Pages 24 – 25, Section 2.1, first paragraph states "The sources of soil contamination at the Site are shown on Figures 6.1 through 6.5 that present Site Wide Hot Spot Soil Exceedance Maps for EPH, VOCs, Semi-Volatile Organic Compounds (SVOCs), Metals, Polychlorinated Biphenyl and (PCBs). These areas of soil contamination may represent persistent sources of groundwater contamination depending upon the mass present, solubility, and mobility of the contaminant and the permeability of the host material." This paragraph should also acknowledge that the sources of soil contamination may also be persistent sources of sediment contamination.

Earth Systems/Hess Response 2: A Sitewide Ecological Evaluation is currently in process at the Site. Once that is complete, analytical results and Site observations will be evaluated to determine the extent and potential sources of impacts to all Site media (and off-site media as applicable) which will include an evaluation of sediment impacts and the potential source of impacts. This sediment evaluation will be included in the next version of the CSM.

EPA Comment 3: Pages 24 – 25, Section 2.1, second paragraph states "The following table identifies the COCs that have been detected in Site soils during investigations conducted from 1993 through 2019 and in groundwater during the 2019 annual sampling event, the media(s) of concern, and the potential COC source." There is no explanation as to how these COCs were identified - were they compared to screening values, if so,

what were the screening values and what is their source. If applicable, reference to the document(s) where soil and groundwater COCs were identified should be provided here.

Earth Systems/Hess Response 3: The COCs listed on pages 24 and 25 are the compounds that have exceeded NJDEP Remediation Standards and are in the process of being delineated as part of Remedial Investigation Activities for various Site Areas of Concern (AOCs). In the revised version of the CSM, we will include information regarding the source of the data that is referenced in this section (2015 Site Investigation Report, Quarterly Reports, and various Remedial Investigation Workplans).

EPA Comment 4: Page 35, Section 5.4, 2nd paragraph states In November 2018, sediment and surface water samples were collected from the Detention Basin. Based on an evaluation of the surface water and sediment analytical results, no impacts were identified in the surface water samples collected from the Detention Basin. However, EPH and VOCs (benzene, carbon disulfide, total xylene, and isopropyl benzene) were identified in the Detention Basin sediment." This text does not agree with the information presented in the February 2020 AOC12: Smith Creek and Detention Basin Supplemental Remedial Investigation Work Plan that details surface water results from the Detention Basin and Smith Creek greater than Ecological Screening Criteria for metals and SVOCs.

Earth Systems/Hess Response 4: The quoted sentence above refers only to the surface water samples collected from the Detention Basin. The sentence should read, "no petroleum impacts were identified in the surface water samples collected from the Detention Basin." A total of twelve (12) surface water samples were collected from the Detention Basin and only one location (SS-3) had a sample result that exceeded the standard for metals only (specifically copper, iron, and lead). The Ecological Evaluation is currently ongoing and additional samples will be collected and the CSM updated to reflect the new data and observations. The Ecological Evaluation will include a discussion of the extent and potential sources of impacts for surface water and sediment.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at ablake@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

Amy Blake
Sr. Project Manager

c. Ms. Julia Galayda, NJDEP Case Manager (via email/Sharefile)
Mr. John Schenkewitz – Hess Corporation (via e-mail)
Mr. Rick Ofsanko – Earth Systems (via e-mail)
Mr. John Virgie – Earth Systems (via e-mail)